Overall comments on this UNE-L impairment analysis

Analysis methodology

This analysis examines the costs that a CLEC would be forced to bear if it were required to use present UNE-L technologies and costs to collect unbundled loops. These calculated costs are in addition to the nonrecurring (NRC) and monthly recurring (MRC) charges paid to the ILEC simply to lease an unbundled loop. Included in these costs are offsets for whatever savings a CLEC might enjoy relative to an ILEC resulting from use of this technology to collect unbundled loops (e.g., savings in switch port costs due to prior digitization and multiplexing of loops).

Because the costs of collecting unbundled loops are very sensitive to:

-- the quantity of loops (A) collected by an individual CLEC out of a particular ILEC end office (EO);

-- the number of ILEC EOs (B) that can be served by a single ILEC "hub" location that houses the CLEC's on-network facilities-based collocation;

-- the number of these CLEC on-network "hub" collocations (C) that can be served by a single CLEC wire center (WC);

the analyst may enter particular values for each of these parameters into this model. The model then develops a per-line cost impairment assuming that the CLEC's EO-specific UNE-L loop collection costs are shared equally across A lines; the CLEC's hub-specific UNE-L loop collection costs are shared equally across A*B lines; and the CLEC's WC-specific UNE-L loop collection costs are shared equally across A*B*C lines.

Input values methodology

The cost input values used in this analysis have been drawn from a number of sources.

Collocation space-related costs are developed assuming the CLEC makes only the most basic generic use (collection of unbundled analog loops) of the collocation facilities. If the use of these facilities is shared with more elaborate telecommunications uses (e.g., the collection of special services, data traffic, exchange access interconnection, etc.) the input costs associated with these collocation facilities (e.g., for floor space, power, etc.) would likely need to be augmented before any larger shared use denominator could be applied.

Collocation equipment and backhaul input expense have been drawn from various sources, including values proposed in the HAI model and values adopted by the FCC for use in its Synthesis Model for local network costs.

Because the intent of this impairment model is to demonstrate the general levels of impairment that would be faced by a UNE-L CLEC attempting to compete with the ILEC on any given scale, the particular input values used in this analysis may not match those faced by any particular CLEC, including AT&T.

User-adjustable input values are given in blue. Model-calculated cell values are in black. Entry of alternative values in the blue cells will cause an automatic recalculation of per line CLEC impairments.